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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS **EASTERN DIVISION**

)	
In re Application of Holland Middle East)	Case No. 08-CV-1344
Trading Ltd. to Obtain Discovery for Use)	
in a Suit Pending in the Haarlem District)	Hon. Ruben Castillo
Court of the Kingdom of the Netherlands)	
)	Magistrate Judge Martin C. Ashman

NOTICE OF MOTION

TO:

Peter V. Baugher & Lindsay Wilson Gowin Schopf & Weiss LLP One South Wacker Drive, 28th Floor Chicago, IL 60606

PLEASE TAKE NOTICE that at 9:45 a.m. on Wednesday, July 30, 2008, or as soon thereafter as counsel may be heard, the undersigned will appear before the Honorable Judge Ruben Castillo, United States District Judge, in the courtroom usually occupied by him in the Dirksen Federal Courthouse, Room 2141, 219 South Dearborn Street, Chicago, Illinois 60604, or in his absence, before such judge who may be sitting in his place and stead, and shall then and there present Respondents' Motion to Compel, filed on behalf of Lee Scott Hillman, Mark Clive Minter, and Power Plate North America, a copy of which accompanies this notice and is hereby served on you.

By: /s/ David W. Porteous

Kurt Stitcher David W. Porteous Amy A. Pines LEVENFELD PEARLSTEIN, LLC 2 N. LaSalle St., Suite 1300 Chicago, Illinois 60602 Phone: (312) 346-8380

Facsimile: (312) 346-8434

Attorneys for Respondents Lee Hillman, Mark Minter, and Power Plate North America

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CERTIFICATE OF SERVICE

I, David W. Porteous, an attorney, hereby certify that on July 25, 2008, I caused a copy of the foregoing Notice of Motion to be filed electronically with the Clerk of the Court using the CM/ECF system, which will automatically send email notifications of such filing to the following attorneys: Peter V. Baugher and Lindsay Wilson Gowin of Schopf & Weiss LLP, One South Wacker Drive, 28th Floor, Chicago IL 60606.

By: /s/ David W. Porteous

LEVENFELD PEARLSTEIN, LLC 2 N. LaSalle St., Suite 1300 Chicago, Illinois 60602 Phone: (312) 344-8380 Facsimile: (312) 346-8434 dporteous@lplegal.com

Attorney for Respondents Lee Hillman, Mark Minter, and Power Plate North America